

THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-66-A

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|----------------------------------------------|---|---------------------------|
| In the Matter of: |) | |
| |) | |
| South Carolina Office of Regulatory Staff's |) | |
| Motion to Solicit Comments from Utilities |) | |
| and Other Interested Stakeholders Regarding |) | NOTICE OF APPEARANCE |
| Measures to Be Taken to Mitigate Impact of |) | AND INTENT TO PARTICIPATE |
| Threats to Safe and Reliable Utility Service |) | |
| |) | |

With this filing, we hereby provide Notice of Appearance of Margaret M. Fox and Rion D. Foley as counsel of record for Piedmont Municipal Power Agency (“PMPA”) in this proceeding. A copy of this Notice is being served on all parties of record. We request that our names be added as attorneys of record for PMPA in this docket, and that any further information or correspondence filed with the Commission be served on the undersigned as counsel for PMPA.

PMPA intends to participate in this proceeding in a limited manner as described herein. PMPA is a public body corporate and politic organized as a joint agency by its member municipalities in South Carolina pursuant to S.C. Code Ann. § 6-23-10 *et seq.* PMPA’s members are municipalities that provide electric service to customers. Several of the members also provide natural gas service. A list of PMPA’s members is attached hereto as Attachment A. The Commission does not regulate the service provided by PMPA’s members. *See* S.C. Code Ann. § 58-27-10(10) (municipalities are “electrical utilities” only to the extent of their business, property, rates, transactions, and operations outside their respective corporate limits); S.C. Code Ann. § 58-27-1010 (“The Commission shall not regulate any contracts made by any municipality with its customers, and nothing in this chapter shall be construed as permitting the regulation by the Commission of the rates to be charged by any municipal plant to any of its customers ...”).

PMPA has reviewed the list of specific issues set forth by the Commission Order No. 2021-163, and does not believe it has pertinent information to provide at this time in response to the Commission's solicitation of comments on those specific issues. However, as the investigation proceeds, PMPA and its members are available to the Office of Regulatory Staff ("ORS") and the Commission to answer any questions and provide information on issues relevant to their respective operations that will assist ORS and the Commission in making a full and comprehensive review of the measures that may be taken to mitigate any impact or threats to safe and reliable electric utility service in South Carolina.

Dated this 20th day of May 2021.

/s/ Margaret M. Fox

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ATTACHMENT A
PMPA MEMBERS

Abbeville

Clinton

Easley

Gaffney

Greer

Laurens

Newberry

Rock Hill

Union

Westminster

**THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-66-A**

In the Matter of:

**South Carolina Office of Regulatory Staff's
Motion to Solicit Comments from Utilities
and Other Interested Stakeholders Regarding
Measures to Be Taken to Mitigate Impact of
Threats to Safe and Reliable Utility Service**

CERTIFICATE OF SERVICE

This is to certify that I, Kathy H. Handrock, a Paralegal with Burr & Forman LLP, have this date served one (1) copy of the Notice of Appearance on behalf of Piedmont Municipal Power Agency ("PMPA") in the above-referenced matter to the person(s) named below by causing said copy to be electronically mailed to the e-mail address on file with the Public Service Commission:

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/s/ Kathy H. Handrock
Kathy H. Handrock

May 20, 2021

Columbia SC